

# **EXHIBIT 2**

Page 1 of 6

**EMPLOYMENT COMPLAINANT INFORMATION SHEET**

State of Illinois

Department of Human Rights

Attachment Page 2016CF1291

**4. RESPONDENT INFORMATION:**

Donald J. O'Neill, Director, Human Resources Division, Case #15 PB 2889

Garry F. McCarthy, Chicago Police Superintendent

Eddie T. Johnson, Chicago Police Superintendent

Chief Juan J. Rivera, Bureau of Internal Affairs

Chicago Police Commander James E. Jones

Chicago Police Sergeant Joaquin Mendoza #2119,

Chicago Police Sergeant Elise Padilla #976,

Chicago Police Sergeant Charles Gray #814

Chicago Police Sergeant Timothy Wolf #1333

Chicago Police Sergeant Robert Vanna #2232

Chicago Police Sergeant Janine Herman #1923

Chicago Police Lieutenant Darren Doss #450

Chicago Police Lieutenant Jaski #728

City of Chicago Police Department

3510 S, Michigan

Chicago, IL 60653

312-744-4000

**Chicago Police Board:**

Max A. Caprioni, Executive Director

Lori E. Lightfoot

Page 2 of 6

Ghian Foreman, member

Melissa M. Ballate, member

William F. Conlon, member

Michael Eaddy, member

Rita A. Fry, member

John H. Simpson, member

Rhonda D. Sweeney, member

Claudia B. Valenzuela, member

City of Chicago Police Board

30 N LaSalle

Suite 1220

Chicago, IL 60602

**6. DESCRIPTION OF THE EMPLOYMENT HARM AND BASES YOU ARE REQUESTING IDHR TO INVESTIGATE:**

**A. FIRST ISSUE OF HARM OR EMPLOYMENT ACTION TAKEN AGAINST YOU BY RESPONDENT:**

I was discharged for reasons of Race, Retaliation and Gender (Sex) and reporting official misconduct.

Basis: Race Retaliation and Gender (Sex)

03/28/2016

**REASON GIVEN BY THE RESPONDENT FOR ACTION TAKEN AGAINST YOU:**

Rule 2. Any action or conduct which impedes the Department's efforts to achieve its policy and goals or bring discredit upon the Department.

Rule 5. Failure to perform any duty.

Rule 6. Disobedience of an order or directive, whether written or oral.

Rule 11. Incompetency or inefficiency in the performance of duty

**Page 3 of 6**

**NAME THE PERSON WHO GAVE YOU THIS INFORMATION:**

Donald J. O'Neill, Director, Human Resources Division, Case #15 PB 2889

Garry F. McCarthy Chicago Police Superintendent

Eddie T. Johnson Chicago Police Superintendent

**Chicago Police Board:**

Max A. Caprioni, Executive Director

Lori E. Lightfoot, police board chair

Ghian Foreman, member

Melissa M. Ballate, member

William F. Conlon, member

Michael Eaddy, member

Rita A. Fry, member

John H. Simpson, member

Rhonda D. Sweeney, member

Claudia B. Valenzuela, member

**NAME OF THE PERSON WHO WAS TREATED MORE FAVORABLY THAN YOU IN A SIMILAR OR COMPARABLE SITUATION:**

Officer Patrick Kelly #12650

Officer Sanja Hodzic #4498

Officer Marco Proano #9477

Officer Joseph J. Walsh #12865

Daphne Sebastian #2763

Officer Janet Mondragon #4364

Officer Dora Fontaine #4484

Officer Ricardo Viramontes #10590

Officer Michelle Morsi Murphy # 4176

Officer Jose Lopez #11943

Page 4 of 6

6.

**B. SECOND ISSUE OF HARM OR EMPLOYMENT ACTION TAKEN AGAINST YOU BY RESPONDENT**

Retaliation.

For reporting a violation of my civil rights and being subjected to a hostile work environment.

Protected activity reporting a violation of my civil rights.

28 March 2016

**BASIS: NOTE: SEE ABOVE FOR THE BASES IDHR CAN INVESTIGATE.**

PROTECTED ACTIVITY

**REASON GIVEN BY RESPONDENT FOR THE ACTION TAKEN AGAINST YOU:**

Failure to assist with taking a subject into custody

**NAME OF PERSON WHO GAVE YOU THIS INFORMATION:** Chicago Police Sergeant Timothy Wolf #1333

**NAME OF THE PERSON WHO WAS TREATED MORE FAVORABLY THAN YOU IN A SIMILAR OR COMPARABLE SITUATION:**

Officer Patrick Kelly #12650

Officer Sanja Hodzic #4498

Officer Marco Proano #9477

Officer Joseph J. Walsh #12865

Daphne Sebastian #2763

Officer Janet Mondragon #4364

Officer Dora Fontaine #4484

Officer Ricardo Viramontes #10590

Officer Michelle Morsi Murphy # 4176

Officer Jose Lopez #11943

**7. WITNESS INFORMATION:**

Chicago Police Officer Yolanda Irby #15236, 3510 S. Michigan, Chicago, IL 60653,

Page 5 of 6

Chicago Police Officer Harolyn Martin #6506, 3510 S. Michigan, Chicago, IL 60653

Chicago Police Officer Ivetta Epinger #9029, 3510 S. Michigan, Chicago, IL 60653

Detention Aide Leo Willis, 3510 S. Michigan, Chicago, IL 60653

Detention Aide Tony Wormley, 3510 S. Michigan, Chicago, IL 60653

Chicago Police Lieutenant Crystal King-Smith #206, 3510 S. Michigan, Chicago, IL 60653

**8. HAVE YOU FILED A PREVIOUS CHARGE AGAINST THIS EMPLOYER ON THIS MATTER WITH EEOC?**

No. EEOC would not let me file because I obtained a charge number from the Illinois Department of Human Rights. 2016CF1291

**9. SPECIAL BASIS**

C. I filed an official complaint with the Chicago Police Department Bureau of Internal Affairs against Sergeant Elise Padilla #976, Sergeant Joaquin Mendoza #2119 and Sergeant Charles Gray #814, for their roles in department policy and rules violations and official misconduct during the initial stages of this investigation for disseminating and broadcasting video evidence in at least four different department locations at separate times, and acting in collusion for the purpose of defaming and discrediting me and creating a hostile work environment.

I believe that it is because I filed the complaint against Sergeant Elise Padilla #976, Sergeant Joaquin Mendoza #2119, and Sergeant Gray #814, I was retaliated against by Chicago Police department members: Chicago Police Superintendent Garry F. McCarthy, Chicago Police Superintendent Eddie T. Johnson, Chief Juan J. Rivera, Bureau of Internal Affairs, Sergeant Joaquin Mendoza #2119, Sergeant Elise Padilla #976, Sergeant Charles Gray #814, Sergeant Timothy Wolf #1333, Sergeant Robert Vanna #2232, Sergeant Hermann #1923, Commander James E. Jones, Lieutenant Darrin Doss #450, Lieutenant Jaski #728.

Chicago Police Board Members: Max A. Caprioni, Executive Director, Lori E. Lightfoot, Ghian Foreman, Melissa M. Ballate, William F. Conlon, Michael Eaddy, Rita A. Fry, John H. Simpson, Rhonda D. Sweeney, Claudia B. Valenzuela, Thomas E. Johnson, Hearing Officer.

I believe reporting the misconduct of the accused during these events lead to my suspension and separation.

On 24 Sept 2014, I filed the complaint against the supervisors for official misconduct.

On 14 July 2015, I was suspended.

28 Mar 2016, I was separated from the Chicago Police Department

**Page 6 of 6**

**Chicago Police Bureau of Internal Affairs Complaint Number: CR 1071679**

**Illinois Department of Human Rights Case Number: 2016CF1291**

**Respectfully submitted,**

**Vincent T. Foggey**



State of Illinois  
Department of Human Rights

# EMPLOYMENT COMPLAINANT INFORMATION SHEET

Office Use Only: Control No. Invoice No.

Date:

Instructions: Read this entire form and all of the instructions carefully before completing. All questions should be answered. This form must be postmarked or received by IDHR within 180 days of the date of the alleged discrimination. IDHR must establish if it has the right under the law to investigate your employment claim. If IDHR accepts your claim of employment discrimination, information will be typed on an official charge form. The charge form must be signed, notarized and returned to IDHR in a timely manner. The form should be signed and dated below. Use additional sheets if necessary. THIS IS NOT A CHARGE. If IDHR accepts your claim, we will send you a charge form for signature.

## 1. COMPLAINANT INFORMATION:

Name: VINCENT T. FOGGAY	Address: 7654 S. CHAMPLAIN	Apt No:
City: CHICAGO	State: IL	ZIP: 60619
Phone No: 773 715 1835	Alt. Phone No: 773 366 8589	Alt. Phone No:
E-Mail: VINCENT.FOGGAY@GMAIL		

## 2. PERSONAL DATA: Please provide the following information for statistical purposes only.

CHECK THE CATEGORY IN THE LIST BELOW OF NATIONAL ORIGIN OR ANCESTRY WITH WHICH YOU MOST STRONGLY IDENTIFY:

<input type="checkbox"/> Greece	<input type="checkbox"/> Haiti	<input type="checkbox"/> India	<input type="checkbox"/> Ireland	<input type="checkbox"/> Italy	<input type="checkbox"/> Japan	<input type="checkbox"/> Korea
<input type="checkbox"/> Liberia	<input type="checkbox"/> Mexico	<input type="checkbox"/> Middle East	<input type="checkbox"/> Pakistan	<input type="checkbox"/> Philippines	<input type="checkbox"/> Poland	<input type="checkbox"/> Puerto Rico
<input checked="" type="checkbox"/> U.S.A.	<input type="checkbox"/> Vietnam	<input checked="" type="checkbox"/> Other African/Non-Arab AFRICAN AMERICAN	<input type="checkbox"/> Other Eastern Europe	<input type="checkbox"/> Other Hispanic		
<input type="checkbox"/> Other Asia	<input type="checkbox"/> Other National Origin or Ancestry	Date of Birth: 21 FEB 69	Sex: M			

3. WHO ELSE CAN WE CALL IF WE CANNOT REACH YOU: Provide the names of two persons who can contact you in the event IDHR is unable to locate you. Make sure the mailing addresses are different from your mailing address. Your charge could be dismissed if you do not provide this information and we are unable to locate you.

Name: JOYCE KIMBROUGH	Address: 7942 S. CHAPPELL	Apt No:
City: CHICAGO	State: IL	ZIP: 60617
Phone No: 773 628 3201		
Name: CRYSTAL KING	Address: 7758 S. LANGLEY	Apt No:
City: CHICAGO	State: IL	ZIP: 60619
Phone No: 773 758 3777		

4. RESPONDENT INFORMATION: Write out the full legal name of the Employer, Union, Employment Agency, Temporary Agency, (i.e., the Respondent) that you believe discriminated against you in Illinois. SEE ATTACHED ITEM 4

IDHR can investigate charges of employment discrimination filed against private employers, state or local government, unions and employment agencies. Individuals can also be charged in some cases. The employer charged with discrimination must have at least 15 employees in the state of Illinois in order for IDHR to investigate, unless the charge alleges sexual harassment, pregnancy, retaliation or physical or mental disability discrimination, or unless the employer is a public contractor. (A public contractor is an employer who does business with the state or a unit of local government.) SEE ATTACHED ITEM 4

Name: CITY OF CHICAGO POLICE	Address: 3510 S. MICHIGAN
City: CHICAGO	State: IL
ZIP: 60653	Phone No: 312 744 4000
County: COOK	Does the Respondent have a total of 15 or more people working in the State of Illinois? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Does the Respondent have a total of 15 or more people working in the United States? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

## 5. IF YOU HAVE BEEN EMPLOYED BY THE RESPONDENT, PLEASE FILL IN THE FOLLOWING:

Job Title: POLICE OFFICER	Office Use Only:
Date Hired: 27 MAR 2006	Were you on probation? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Salary: 69,900	<input type="checkbox"/> Hourly <input type="checkbox"/> Weekly <input type="checkbox"/> Bimonthly <input type="checkbox"/> Monthly <input checked="" type="checkbox"/> Annually
Department: POLICE	Supervisor: Commander Doran Doss

100 W. Randolph St., 10th Floor, Attn. Intake Unit, Chicago, IL 60601; 312-814-6200; 866-740-3953 (TTY); INTERVIEWS MON.-THURS. 8:30 AM to 4:00 PM  
In Springfield: 222 South College, Room 101-A, Attn. Intake Unit, Springfield, IL 62704; 217-785-5100; 866-740-3953 (TTY)  
WEBSITE: www.illinois.gov/dhr/ CHICAGO FAX: 312-814-6251 SPRINGFIELD FAX: 217-785-5106

CIS-E. 12/9/2015



Illinois Department of Human Rights

## EMPLOYMENT COMPLAINANT INFORMATION SHEET

IDHR can only investigate charges alleging the following Bases of discrimination: Age (40 and over), Physical or Mental Disability (unrelated to ability to do the job), Arrest Record (or criminal history record ordered expunged, sealed or impounded), Retaliation (complained about unlawful discrimination, filed a prior discrimination claim, or testified at a discrimination hearing), Coercion/Aiding and Abetting (helping or forcing a person to commit unlawful discrimination based upon any of the categories listed), Race, Unfavorable Military Discharge, Marital Status, Color, Ancestry, Military Status, Religion, Citizenship Status, National Origin, Sexual Harassment, Sex, Pregnancy, Sexual Orientation, or Order of Protection Status. IDHR cannot investigate: unfair employment actions such as: political affiliations, personality conflicts, etc., unless such actions are alleged to be for one or more of the bases (Types of Discrimination) listed above; unfair union practices unless such claims involve one or more of the types of discrimination listed above; charges against the federal government (such a charge can only be filed with the EEOC office of the agency alleged to have discriminated).

## 6. DESCRIPTION OF THE EMPLOYMENT HARM AND BASES YOU ARE REQUESTING IDHR TO INVESTIGATE

A. FIRST ISSUE OF HARM OR EMPLOYMENT ACTION TAKEN AGAINST YOU BY RESPONDENT: *DISCHARGED FOR REASONS OF RACE, GENDER AND RETALIATION*

BASIS: Note: see above for the Bases IDHR can investigate.

*RACE SEX RETALIATION*

Date of Action:

*3/28/16*

Reason given by Respondent for the action taken against you:

*DEPARTMENT RULES VIOLATIONS. SEE ATTACHED 6A*

Name of the person who gave you this information:

*SEE ATTACHED ITEM 6A*

Job Title:

Name an employee who was treated more favorably than you in a similar or comparable situation:

*SEE ATTACHED ITEM 6A*

B. SECOND ISSUE OF HARM OR EMPLOYMENT ACTION TAKEN AGAINST YOU BY RESPONDENT (IF APPLICABLE):

BASIS: Note: see above for the Bases IDHR can investigate.

*PROTECTED ACTIVITY*

Date of Action:

*28 MAR 16*

Reason given by Respondent for the action taken against you:

Name of the person who gave you this information:

Job Title:

Name an employee who was treated more favorably than you in a similar or comparable situation:

*SEE ATTACHED ITEM 6B*

## 7. WITNESS INFORMATION

Name: <i>P.D. YOLANDA IRBY</i>	Address: <i>3510 S. MICHIGAN</i>		Apt No:
City: <i>CHICAGO</i>	State: <i>ILLINOIS</i>	ZIP: <i>60653</i>	Phone No: <i>312 744 4966</i>
Name: <i>P.D. HARDLYN MARTIN</i>	Address: <i>3510 S. MICHIGAN</i>		Apt No:
City: <i>CHICAGO</i>	State: <i>ILLINOIS</i>	ZIP: <i>60653</i>	Phone No: <i>312 744 4966</i>

Department of Human Rights

## EMPLOYMENT COMPLAINANT INFORMATION SHEET

HAVE YOU FILED A PREVIOUS CHARGE AGAINST THIS EMPLOYER ON THIS MATTER WITH THE EEOC?

☐ Yes ☒ No If "Yes", when?

SEE ATTACHMENT ITEM 8

## 9. SPECIAL BASES

A. If you claimed SEXUAL HARASSMENT as a basis:

Name of the harasser:

Job Title of harasser:

Do you want the sexual harasser charged separately as an additional respondent? ☐ Yes ☐ No

If yes, provide the following information for that person:

Address:

City:

State:

ZIP:

Phone #:

B. If you claimed PHYSICAL OR MENTAL DISABILITY as a basis:

State your medically diagnosed disability/disabilities:

Explain how the Respondent became aware of each disability:

C. If you claimed RETALIATION as a basis:

State how you opposed unlawful discrimination: (i.e., testified at a discrimination hearing, filed a prior discrimination claim, or complained about unlawful discrimination). Include dates, charge numbers, and/or the name or title of the person to whom you complained.

SEE ATTACHMENT ITEM 9.C.

10. HAVE YOU FILED A PREVIOUS CHARGE AGAINST THIS EMPLOYER WITH IDHR?

☒ Yes ☐ No Charge Number(s):

2016 CF 1291

## CONSENT AGREEMENT AND RELEASE

I have read the provided "Notice to Complainant" and I understand that: 1) IDHR may also file my charge of discrimination with EEOC if it has jurisdiction, and I authorize EEOC to look into the discrimination alleged above; 2) In the course of investigating my charge, IDHR will reveal my identity (including my name) and my personal information to named Respondent(s) in my charge to obtain facts and evidence regarding my charge; 3) I do not have to reveal my personal information to IDHR, but IDHR may close my charge if I refuse to reveal information needed to fully investigate my charge; 4) IDHR may be required by law, subpoena, court order, and/or FOIA request to disclose my charge and information in the Department's investigation file concerning my charge to persons outside of IDHR.

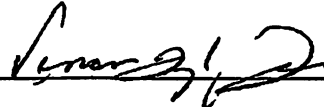
If IDHR takes a charge based on the information provided, I consent for IDHR to disclose my identity and personal information as necessary to process and investigate my charge, and I release IDHR from any liability whatsoever concerning disclosure of my identity and any personal information I provided to IDHR or IDHR obtained in processing my charge.

My signature below verifies the accuracy of the information provided herein and my consent and release as indicated above.

Print Name

VINCENT T. FOLGER

Signature



Date

06/07/16

NOTE: If there is certain personal information you would like withheld, please discuss your concern with an Intake supervisor.